

EXHIBIT A

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Attorneys for Community Unit School District 300

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

)
) Chapter 11
)
)
)
) Case No. 18-23538 (RDD)
) (Jointly Administered)
)
)
)

NOTICE OF DEPOSITION

To: Jared R. Friedmann
Weil Gotshal & Manges, LLP
767 Fifth Avenue
New York, NY 10153

Ex. D

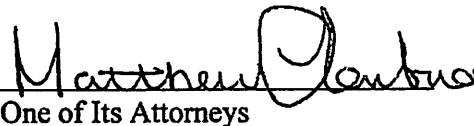
PLEASE TAKE NOTICE that Community Unit School District 300, an Illinois school district existing and operating pursuant to the Illinois School Code (the “School District”), by and through its attorneys, Robbins, Schwartz, Nicholas, Lifton & Taylor, Ltd., Gensburg, Calandriello & Kanter, P.C. and Archer & Greiner, P.C., pursuant to Rule 7030(b)(6) of the Federal Rules of Bankruptcy Procedure and Rule 30(b)(6) of the Federal Rules of Civil Procedure, and in accordance with the Order Implementing Certain Notice and Case Management Procedures dated October 17, 2018 [Doc. No. 139], which authorizes discovery in contested matters, will take the deposition of the representative(s) of the of the above-captioned debtors (the “Debtors”) with the most knowledge about or regarding the subject matter and documents set forth in the “Rider” attached hereto, beginning March 22, 2019 at 10:00 a.m. (ET) at the office of Archer & Greiner, P.C., 630 Third Avenue, New York, New York, 10017, or at such other time and place as the parties mutually agree.

PLEASE TAKE FURTHER NOTICE that the deposition will take place upon oral examination pursuant to the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Civil Procedure made applicable to this proceeding, and will be recorded by sound, video, and/or stenographic means before a notary public or other officer authorized by law to administer oaths.

The deposition will continue until completed, with such adjournments as to time and place may be necessary.

Dated: March 14, 2019

COMMUNITY UNIT SCHOOL DISTRICT 300

By: 
One of Its Attorneys

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RIDER

TOPICS OF EXAMINATION

1. The documents, information and data attached to or referenced in the Declaration of Mohsin Y. Meghji [Doc. No. 2717], including documents, information and data which detail:

- a. How Sears tracked its eligibility for an "EDA Credit" received from the Village of Hoffman Estates, Illinois,
- b. How Sears calculated the number of such workers at its Hoffman Estates campus, including: (1) the number of Sears employees working 35 or more hours per week at its Hoffman Estates campus, (2) the number of employees of tenant companies at the Hoffman Estates campus working 35 or more hours per week, (3) the number of contractors working 35 hours or more per week at the Hoffman Estates campus, and (4) the number of building, or OTB, contractors working more than 35 hours per week at the Hoffman Estates campus.

2. The total number of such EDA Credit-qualifying workers and contractors at the end of each month in 2018.

3. Correspondence between Sears and the Village of Hoffman Estates, concerning Sears alleged eligibility for an EDA Credit from the Village of Hoffman Estates for the calendar years 2012 through and including 2018.

4. The documents produced in response to the document request sent from Kenneth M. Florey of Robbin Schwartz dated January 15, 2019.

5. Sears' interpretation of the jobs requirements under the Economic Development Area Tax Increment Allocation Act (20 ILCS 620/1 et seq.) and the Economic Development for a Growing Economy Tax Credit Act (35 ILCS 10/5-1 et seq.) for calendar years 2012 through and including 2018.

6. Records of counting eligible jobs under the Economic Development Area Tax Increment Allocation Act (20 ILCS 620/1 et seq.) and the Economic Development for a Growing Economy Tax Credit Act (35 ILCS 10/5-1 et seq.) for calendar years 2012 through and including 2018.

7. Methods for counting eligible jobs under the Economic Development Area Tax Increment Allocation Act (20 ILCS 620/1 et seq.) and the Economic Development for a Growing Economy Tax Credit Act (35 ILCS 10/5-1 et seq.) for for calendar years 2012 through and including 2018.

8. Electronic hardware, electronic software, systems, and other tools used in counting eligible jobs under the Economic Development Area Tax Increment Allocation Act (20 ILCS 620/1 et seq.) and the Economic Development for a Growing Economy Tax Credit Act (35 ILCS 10/5-1 et seq.) for calendar years 2012 through and including 2018.

CERTIFICATE OF SERVICE

Matthew T. Gensburg, an attorney, certifies that on the 14th day of March, 2019, a true and accurate copy of the **Notice of Deposition** was served upon the following parties via email.

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Michael L. Schein
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Dated: March 14, 2019

Matthew Gensburg